

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 1:21-cr-40

Plaintiff,

Hon. Robert J. Jonker
Chief United States District Judge

v.

CHRISTOPHER ALLAN BODEN, a/k/a
“Captain,” LEESA BETH VOGT, a/k/a
“Lis Bokt,” a/k/a “Moose,” and DANIEL
REYNOLD DEJAGER, a/k/a “Daniel
Reynold,” a/k/a “Daniel Miester,” a/k/a
“Danichi,”

Hon. Phillip J. Green
United States Magistrate Judge

Defendants.

**DEFENDANTS’ JOINT UNOPPOSED MOTION
TO EXTEND THE DEADLINE TO FILE PRE-TRIAL MOTIONS**

Defendants Christopher Allan Boden, Leesa Beth Vogt, and Daniel Reynold DeJager, by and through their undersigned attorneys, respectfully request the Court to extend the current deadline for the parties to file their pre-trial motions.

The Court previously set a deadline of July 1, 2021 for the Defendants to file pre-trial motions and a trial date of September 21, 2021. (ECF No. 34.) Defendants have analyzed and continue to analyze and consider the potential to file a joint pretrial motion, and in light of the novel legal issues presented by this matter, respectfully request that the Court extend that deadline by 14 days to **July 15, 2021**. FED. R. CRIM. P. 12(c)(2). Defendants do not seek to alter any other dates applicable to this matter.

On June 18, 2021, AUSA Justin Presant informed Defendants' counsel via email that the United States does not object to the requested relief. Consequently, the request is "unopposed" by the United States.

Dated: June 21, 2021

/s/ Brian P. Lennon

Brian P. Lennon (P 47361)
Paul H. Beach (P82036)
Warner Norcross + Judd LLP
150 Ottawa Avenue, NW, Suite 1500
Grand Rapids, MI 49503
(616) 752-2000
blennon@wnj.com
pbeach@wnj.com

Attorneys for Defendant Christopher Boden

Dated: June 21, 2021

/s/ Brett A. Purtzer (with permission)

Brett A. Purtzer
HESTER LAW GROUP, INC., P.S.
1008 S. Yakima Avenue, Suite 302
Tacoma, WA 98405
(253) 272-2157

*Attorneys for Defendant Daniel Reynold
DeJager*

Dated: June 21, 2021

/s/ Matthew G. Borgula (with permission)

Matthew G. Borgula (P57330)
Laura J. Helderop (P82224)
SPRINGSTEAD BARTISH BORGULA &
LYNCH, PLLC
60 Monroe Center NW, Suite 500
Grand Rapids, MI 49503
(616) 458-5500

Attorneys for Defendant Leesa Vogt

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